Supreme Court, U. S.
FILED
NOV 29 1980
MICHAEL RODAK, JR., CLERK

No. 80-195

IN THE

Supreme Court of the United States

OCTOBER TERM, 1980

METROMEDIA, INC., *Appellant,*

v.

CITY OF SAN DIEGO, a municipal corporation, and DOES I through XX, inclusive, *Appellees.*

PACIFIC OUTDOOR ADVERTISING CO., INC., *Appellant,*

v.

THE CITY OF SAN DIEGO, a municipal corporation, THE CITY COUNCIL OF SAN DIEGO, VOYD BEIGHTS, Zoning Administrator of the City of San Diego and DOES 1 through 10, inclusive, *Appellees.*

On Appeal From The Supreme Court Of California

BRIEF OF THE OUTDOOR ADVERTISING ASSOCIATION OF AMERICA AS AMICUS CURIAE IN SUPPORT OF APPELLANTS

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November 28, 1980

PRESS OF BYRON S. ADAMS PRINTING, INC., WASHINGTON, D. C.

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BRIEF OF THE OUTDOOR ADVERTISING ASSOCIATION OF AMERICA AS AMICUS CURIAE IN SUPPORT OF APPELLANTS

INTEREST OF AMICUS CURIAE

This brief is submitted by the Outdoor Advertising Association of America (OAAA) as *amicus curiae*. The consent of each party to the filing of the brief has been secured pursuant to Rule 36.2 of this Court. The brief supports the position of appellants in this case and urges reversal of the decision below.

The OAAA is the trade association of the standardized outdoor advertising industry in the United States. Its functions include the promotion of outdoor advertising as a means of public communication, the collection of data concerning the cost and effectiveness of outdoor advertising and of other mass media, the promulgation of a code of recommended practices which recognizes the importance of locating outdoor advertising signs only in commercial and industrial areas, and support for federal, state and local regulations which implement that policy.

The OAAA's membership is composed of one hundred and sixty-nine companies which serve 7,900 distinct local areas throughout the United States. These members are principally small, locally based family-owned businesses which serve a single locality or contiguous localities within a particular state. Other OAAA members are relatively large companies which operate on a regional and national basis. The broad geographic scope of the outdoor advertising industry is reflected in the listing of OAAA members and the location of their principal offices in Appendix B.

The members of the OAAA have an intense interest in this case since the central issue before the Court is whether a municipality may use its police power to totally suppress outdoor advertising. The Court's dis-

position of this appeal will have an immediate impact on the continued existence of the outdoor medium in California. 17 counties and 209 cities within that state have already completely prohibited outdoor advertising. Many of these ordinances have not been directly challenged because they preclude billboards from localities which are particularly scenic or principally residential in character without appreciable commercial or industrial activity. But there is also substantial litigation presently pending in the California Courts challenging restrictions which would either limit, or totally eliminate outdoor advertising from commercial or industrial areas in many major cities or counties. Legislation similar to the San Diego ordinance is also under consideration in other California municipalities. The Court's disposition of this appeal will directly determine the validity of all of these measures and thus will have a decisive impact on whether the outdoor medium will be suppressed within California.

The implications of this case are equally decisive with respect to the continued viability of outdoor advertising throughout the United States. Many localities now permit outdoor advertising within narrowly defined areas, principally in commercial and industrial zones. Nevertheless, outdoor advertising is regularly subject to efforts at its suppression. The Court's disposition of the instant appeal will determine the scope of future regulation of outdoor advertising and the vulnerability of the medium to moves for its elimination on a national basis.

Finally, aside from the strictly legal considerations involved, this appeal will have decisive effect on the

broad range of business decisions which will also determine the extent to which the outdoor advertising industry will remain a significant medium. Simply stated, a legal environment which countenances the total abolition of outdoor advertising without just compensation for the loss of investment inevitably will chill the industry's access to capital. Indeed, such circumstances would compel many outdoor advertising companies themselves to seriously question whether they can continue to justify the expenditures necessary to maintain and improve existing sign structures when measured against alternative investment opportunities.

It is not the purpose of this brief to discuss every First Amendment issue that may be raised by the San Diego ordinance nor to respond to every argument that could be presented by the appellee. Rather, the OAAA believes it can best be of assistance to the Court by drawing on its expertise to explain the singular characteristics of outdoor advertising that make it a key means of communication which cannot readily be replaced. To do this, the OAAA has assembled advertising cost data for the principal mass media from standard references widely recognized as authoritative and has prepared a series of comparisons of intermedia costs in six sample markets. These comparisons are discussed in this brief and are set forth in detail in Appendix A hereto. This data documents the extraordinary differential in cost-efficiency between outdoor advertising and the other mass media and demonstrates the true lack of viable alternative channels for mass communications for those who rely on the medium.

Accordingly, the Outdoor Advertising Association of America respectfully submits this brief in support of the appellants and to impress upon the Court the inevitable threat to protected expression which would flow from the prohibition of outdoor advertising.

ARGUMENT

The San Diego ordinance conflicts directly with a broad range of decisions by this Court which have consistently rejected measures that completely ban a distinct form of communication. *Lovell* v. *City of Griffin,* 303 U.S. 444, 452 (1938) (distribution of circulars, handbills, etc.); *Schneider* v. *New Jersey,* 308 U.S. 147 (1939) (handbills); *Martin* v. *City of Struthers,* 319 U.S. 141, 143 (1943) (door-to-door solicitation); *Saia* v. *New York,* 334 U.S. 558 (1948) (sound trucks); *Cf. Police Department* v. *Mosley,* 408 U.S. 92 (1972) (picket signs); *Erznoznik* v. *City of Jacksonville,* 422 U.S. 205 (1975) (exhibition of nudity at drive-in movie theaters); *Town of Southampton* v. *Troyer,* 49 U.S.L.W. 3371 (U.S. Nov. 17, 1980) (door-to-door solicitation). The decisions of this Court reflect a studied effort to husband the limited channels for public expression in recognition of the fact that meaningful access to the means of communication is the undergirding of protected expression itself. A speaker must have the opportunity to "reach the minds of willing listeners and to do so there must be an opportunity to win their attention." *Kovacs* v. *Cooper,* 336 U.S. 77, 87 (1949). The Court has tolerated the imposition of restraints on a means of communication only where the government can demonstrate that such controls are the least encompassing method of serving a compelling, and well documented public interest. *Cf. First National*

Bank of Boston v. *Bellotti*, 435 U.S. 765 (1978); *Buckley* v. *Valeo*, 424 U.S. 1, 25 (1976) (per curiam). But the Court's decisions have not condoned the complete suppression of an entire medium.

By invoking time, place and manner analysis, the California Supreme Court has not found a rationale for police power actions which totally suppress speech through a particular means of communication. Justification for a total ban on outdoor advertising does not repose in the fact that other media remain unaffected by the prohibition. This Court has never been persuaded by assertions that "the speakers' listeners could come by his message by some other means." *Virginia State Board of Pharmacy* v. *Virginia Citizens Consumer Council, Inc.*, 425 U.S. 748, 757 n.5 (1976). Liberty of expression may not be prohibited on the basis that it may be exercised in some other place. *Schneider* v. *New Jersey*, 308 U.S. 147 (1939).

I. San Diego's Prohibition of Outdoor Advertising Cannot Be Justified by the Existence of Other Media Which Are Not Viable Cost Effective Alternatives.

The California Supreme Court bottoms much of its decision on the assumption that the elimination of outdoor advertising would merely signal a migration of users of this medium to other forms of communication. The conclusion has no basis in the trial record and conflicts diametrically with the stipulations of the parties themselves regarding the impact of the San Diego ban.

> 28. Outdoor advertising increases the sales of products and produces numerous direct and indirect benefits to the public. Valuable commercial, political, and social information is communicated

> to the public through the use of outdoor advertising. Many businesses and politicians and other persons rely on outdoor advertising because other forms of advertising are insufficient, inappropriate and prohibitally [sic] expensive. Jurisdictional Statement, Appendix H, p. 125a-126a.

The California Court's suppositions do not satisfy this Court's insistence that restrictions on a means of communication can be sustained only when grounded on a concrete assessment of whether alternative media provide realistic avenues for speech that has been foreclosed by such constraints. Certainly, the California Court's support for San Diego's prohibition of an entire medium cannot withstand this scrutiny. Thus in *Linmark Associates, Inc.* v. *Township of Willingboro,* 431 U.S. 85 (1977), the Court rejected the contention that "For Sale" signs could be prohibited because alternative means of advertising were available:

> Although in theory sellers remain free to employ a number of different alternatives, in practice realty is not marketed through leaflets, sound trucks demonstrations, or the like. The options to which sellers realistically are relegated—primarily newspaper advertising and listing with real estate agents—involve more cost and less autonomy than "For Sale" signs; are less likely to reach persons not deliberately seeking sales information; and may be less effective media for communicating the message that is conveyed by a "For Sale" sign in front of the house to be sold. The alternatives, then, are far from satisfactory. Id. at 93 (citations omitted)

Like every medium of communication, outdoor advertising has certain distinct capabilities and characteristics which make it unique. The fixed written and

pictorial copy of a billboard is evocative because it is succinct and directed. A radio advertisement must be structured differently in order to command the same attention and a strategy for repetition must be established if it is to have substantial impact. Indeed the print copy used in newspaper advertisement must be designed differently than outdoor advertising copy in order to negate the "clutter" resulting from advertisements and editorial content. Schwartz, *The Responsive Cord* (Doubleday 1974).

Media also project to an audience through different forums. Television, direct mail and newspapers are generally regarded as so called in-home media because they reach the audience in the privacy of the home or workplace. The significance of radio is closely tied to automobile travel. Outdoor advertising is predicated on the dissemination of information in a wholly public environment and is classified as an out-of-home media. This welter of factors color a speakers' choice of the medium which best projects his particular message. But perhaps the most fundamental measure of a speaker's real options is the actual comparative costs of disseminating his message in each medium.

The simple fact is that outdoor advertising is the least expensive and most cost-efficient mass medium available for the broad dissemination of a message within a geographical area. The extraordinary cost differential between outdoor advertising and the other mass media is illustrated in the detailed analysis of media costs set forth in Appendix A. This data is presented in terms of comparative advertising costs for outdoor, radio, TV, and newspaper advertising in six sample markets—Denver, Colorado; Waco, Texas; Chicago, Illinois; Minneapolis, Minnesota; Birming-

ham, Alabama; and Rochester, New York.[1] The statistics involved have been derived directly from published, generally accepted standard reference services which audit the potential audience exposure for every mass media outlet operating in the United States. These reporting services are regarded as authoritative by the individual media involved and are customarily relied upon by media planners.

Appendix A presents this information through two tables. The first shows the cost to an advertiser of achieving a specific level of exposure for a message in each medium. The second shows the audience exposure which can be achieved through comparable expenditures in each medium. Both tables state audience exposure in terms of Gross Rating Points (GRPs), the standard measure used by media planners as an indication of relative media efficiency.[2] The samples are based upon media "buys" which show each medium in its most favorable light in terms of cost and audience coverage. Although different combinations of time slots, page sizes, and station selections could be studied, Appendix A accurately portrays the extraordinary divergence between the cost of outdoor advertising and the costs of all other major mass media which would emerge from any comparison.

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[1] Like virtually all media (except national television and magazines), outdoor advertising is essentially a local medium, purchased to reach an audience within a given local geographical area. Accordingly, Appendix A compares outdoor advertising and other media devoted to local advertising—newspapers, radio, and the limited sector of television time, known as "spot" TV, devoted to local advertising.

[2] GRPs represent the proportion of a given audience reached by a medium over a particular duration of time. For a full description, see Note on Methodology and Sources, page 3a *infra*.

The comparisons set forth in Appendix A reveal in graphic terms the fundamental fact which local political candidates, commercial advertisers and interest groups must invariably confront—it costs literally thousands of dollars, and often tens of thousands of dollars, more to secure comparable exposure through the principal mass media alternatives to outdoor advertising. Thus, as Table I of Appendix A demonstrates, in Denver, where a typical outdoor advertising "buy" would cost $5,100, comparable audience exposure or GRPs through radio would cost $33,462. In Waco, Texas, a much smaller market, it would cost $4,767 to achieve through newspaper advertisements the same scope of exposure yielded by an expenditure of $600 for outdoor advertising. In Birmingham, achieving a comparable level of audience exposure in newspapers, radio, and spot TV, would cost, respectively, 3.53, 3.81, and 6.88 times the cost of outdoor advertising. Similar results are obtained in the other cities reviewed in Appendix A.[3]

The implications of this cost data are obvious. For any advertiser, but especially those with limited resources and those seeking the broadest dissemination of their message, outdoor advertising is singularly cost effective. In response to the complete elimination of this medium, some well-financed advertisers who use outdoor advertising might simply increase expendi-

[3] Figures for direct mail advertising are not readily compared with those for other mass media, because of the particularly targeted audiences for which direct mail is used. By any measure, however, direct mail is vastly more expensive than outdoor advertising. Expressed simply in terms of cost per rating point, for example, direct mail is roughly 9 times more expensive than outdoor advertising in Birmingham, and roughly 6.8 times more expensive in Minneapolis.

tures in other media in order to maintain exposure levels. But for many, such a prohibition extinguishes their principle, or only means of reaching the public effectively. Their options are foreclosed.

II. Outdoor Advertising Is A Major Medium of Communications Which Expands the Opportunities for Expression Because of Its Unique Characteristics.

Billboards have been a primary means of communication in the United States since the country's inception. *See, e.g.,* P. Davidson, *Propaganda and the American Revolution,* 217-23 (1941); Gallo, *The Poster in History* (1972). Outdoor advertising has retained its significance because it is an integral component of mass communications. The striking cost-efficiency of outdoor advertising is undeniable. As the examples of billboards in Appendix I to the Jurisdictional Statement illustrate, the outdoor medium is particularly effective for projecting specific information and ideas susceptible of being stated in a succinct and straight-foreward form. *See also* S. Henderson & R. Landau, *Billboard Art* (1980). Obviously, outdoor advertising is not the most suitable medium for every type of message. But the particular characteristics of outdoor advertising clearly are very important to a myriad of political, commercial, and special interest advertisers who wish to communicate to the public. Because outdoor advertising uniquely meets their specific communications requirements, often exclusively so, billboards remain a significant medium that has become an entrenched part of the fabric of communications.

This Court has noted with respect to door-to-door canvassing that its "widespread use" attests to the

fact that it is "one of the most accepted techniques of seeking popular support." *Martin* v. *City of Struthers,* 319 U.S. 141, 145-46 (1943). Likewise, the Court has moved decisively to preserve the use of sound trucks because "[i]t is the way people are reached." *Saia* v. *New York,* 334 U.S. 558, 561 (1948). Outdoor advertising is more than a way people are reached. It is the least expensive of the mass media. It is an elemental and traditional means of communication which has retained its significance because it is cost-efficient and unique. The complete prohibition of outdoor advertising from even commercial and industrial areas under the guise of police power regulation, inevitably diminishes the opportunity for protected expression and is therefore wholly inconsistent with the purposes of the First Amendment.

CONCLUSION

For the reasons stated above, the decision of the Supreme Court of California should be reversed.

Respectfully submitted,

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November 28, 1980

APPENDIX

APPENDIX A

TABLE I*

Cost of Achieving Comparable Audience Exposure Through Principal Local Media

	Outdoor	Newspaper	Radio	Spot TV
Denver, CO				
Audience Size (GRPs)	813	810	811	805
Cost	$5,100	$17,095	$33,462	$65,599
Cost as Percentage of Outdoor Cost	—	335%	656%	1,286%
Birmingham, AL				
Audience Size (GRPs)	503	511	498	495
Cost	$2,450	$8,648	$9,331	$16,870
Cost as Percentage of Outdoor Cost	—	353%	381%	688%
Waco, TX				
Audience Size (GRPs)	669	673	666	666
Cost	$600	$4,767	$2,754	$10,392
Cost as Percentage of Outdoor Cost	—	795%	459%	1,732%
Chicago, IL				
Audience Size (GRPs)	615	591	609	595
Cost	$23,732	$69,465	$71,400	$193,343
Cost as Percentage of Outdoor Cost	—	293%	301%	815%
Minneapolis, MN				
Audience Size (GRPs)	661	663	658	662
Cost	$10,575	$32,103	$28,608	$114,135
Cost as Percentage of Outdoor Cost	—	304%	271%	1,079%
Rochester, NY				
Audience Size (GRPs)	694	694	697	690
Cost	$2,850	$19,912	$13,680	$31,248
Cost as Percentage of Outdoor Cost	—	699%	480%	1,096%

* See page 3a *infra* for Note on Methodology and Sources.

TABLE II

Audience Exposure Achieved Through Comparable Expenditures in Principal Local Media

	Outdoor	Newspaper	Radio	Spot TV
Denver, CO				
Cost	$5,100	$4,980	$5,148	$5,034
Audience Size (GRPs)	813	235	125	70
GRPs as Percentage of Outdoor GRPs	—	29%	15%	9%
Birmingham, AL				
Cost	$2,450	$2,425	$2,604	$2,470
Audience Size (GRPs)	503	94	139	70
GRPs as Percentage of Outdoor GRPs	—	19%	28%	14%
Waco, TX				
Cost	$600	$686	$612	$636
Audience Size (GRPs)	669	64	148	40
GRPs as Percentage of Outdoor GRPs	—	10%	22%	6%
Chicago, IL				
Cost	$23,732	$23,520	$23,800	$23,223
Audience Size (GRPs)	615	186	203	73
GRPs as Percentage of Outdoor GRPs	—	30%	33%	12%
Minneapolis, MN				
Cost	$10,575	$10,701	$10,568	$10,625
Audience Size (GRPs)	661	220	243	62
GRPs as Percentage of Outdoor GRPs	—	33%	37%	9%
Rochester, NY				
Cost	$2,850	$3,004	$2,854	$2,912
Audience Size (GRPs)	694	97	147	64
GRPs as Percentage of Outdoor GRPs	—	14%	21%	9%

NOTE ON METHODOLOGY AND SOURCES

Audience size is measured in monthly gross rating points (GRPs) for adults aged 18-49, the standard measure of audience exposure in the advertising industry. Monthly GRPs represent the number of exposures during a month to an advertising message within a particular demographic group, expressed as a percentage of the population of that demographic group. For example, to say that an expenditure of $33,462 on radio advertising in Denver will yield 811 GRPs in a month among young adults aged 18-49 means that over the course of the month the number of exposures to the radio message among young adults in Denver will equal 811% of the young adult population in Denver. That is, on the average, every young adult will be exposed to the message 8.11 times per month.

The GRP measure encompasses two factors—"reach" and "frequency." "Reach" is the percentage of young adults who are exposed to an advertising message at least once during a month. "Frequency" is the average number of times that a young adult among the "reach" group is exposed to the advertising message during the month. GRP is the product of reach times frequency.

Table I is constructed for each city by beginning with the monthly cost and audience size (in terms of GRPs for adults aged 18-49) for a standard "#25 GRP showing" in outdoor advertising. (A #25 GRP showing is one which achieves 25 *daily* GRPs among the entire population.) Actual advertising "buys" in newspapers, radio, and "spot" (local) TV were then scanned to find the advertising "buy" for each medium that achieves a comparable GRP level. Table I shows the cost of the advertising "buy" in each medium that achieves a comparable GRP level. The final line for each city in Table I shows the costs of each medium as a percentage of the cost of outdoor advertising. Thus, the cost of a spot TV "buy" in Minne-

apolis that achieves 661 monthly GRPs is 662% of (6.62 times) the cost of the outdoor "buy" that achieves the same GRP level.

Table II is constructed for each city by again beginning with the monthly cost and audience size for the standard "#25 GRP showing" in outdoor advertising. Actual advertising "buys" in newspapers, on radio and spot TV were again scanned, to find the advertising "buy" for each medium that can be secured through a comparable cost expenditure. Table II shows the GRP level that is achieved in each medium through an equivalent expenditure.

The monthly advertising "buys" for each medium in each sample city are as follows:

DENVER

Outdoor — 12′ x 25′ poster panels

Selection: 1 #25 GRP showing, consisting of 21 boards.

Sources: Reach/frequency: AMMO.*
Costs: Eller Outdoor Rate Card, 1980-1981.

Radio — 30-second spots

Selection: Top 5 stations for Adults 18-49 in Drive Time.

		TABLE I		TABLE II	
Station	Cost per Spot	No. of Spots	Cost	No. of Spots	Cost
KHOW-AM	$160	12	$1,920	78	$12,480
KIMN-AM	90	12	1,080	78	7,020
KBPI-FM	60	12	720	78	4,680
KLZ-AM	78	12	936	78	6,084
KPPL-FM	41	12	492	78	3,198
TOTAL		60	$5,148	390	$33,462

Sources: Ratings: *Arbitron,* April-May 1980 (based on Average Quarter Hour).
Costs: Direct inquiries to individual stations.

* AMMO is "Audience Market by Market for Outdoor," a computer data service prepared by the Institute for Outdoor Advertising.

Television — 30-second local spots

Selection:

Daypart	Cost per Spot	Rating Adults 18-49	TABLE I No. of Spots	TABLE I Cost	TABLE II No. of Spots	TABLE II Cost
Early Fringe	$ 297	5.20	4	$1,188	31	$ 9,207
Late Fringe	382	8.65	3	1,146	31	11,842
Prime	1,350	11.41	2	2,700	33	44,550
TOTAL			9	$5,034	95	$65,599

Source: Ratings and Costs: *Media Market Guide,* 4th Qtr., 1980 (station averages).

Newspaper — ¼ page insertions

Selection:

Paper	Circulation	Audience Adults 18-49	Cost per Insert	TABLE I No. of Inserts	TABLE I Cost	TABLE II No. of Inserts	TABLE II Cost
Rocky Mt. News	222,330	312,751	495	3	$1,485	11	$ 5,445
Post	218,809	307,717	1,165	3	3,495	10	11,650
TOTAL				6	$4,980	21	$17,095

Sources: Circulation: *Circulation,* 1980-1981
Audience, Adults 18-49: *Arbitron,* April-May 1980
Costs: *Media Market Guide,* 4th Qtr., 1980 (open line rate for ¼ page ads)

BIRMINGHAM

Outdoor — 12′ x 25′ poster panels

Selection: 1 #25 GRP showing, consisting of 14 boards.

Sources: Reach/frequency: AMMO.
Costs: *Buyers Guide to Outdoor Advertising*, 1980-1981 (1981 rates).

Radio — 30-second spots

Selection: Top 5 stations for Adults 18-49 in Drive Time.

		TABLE I		TABLE II	
Station	Cost per Spot	No. of Spots	Cost	No. of Spots	Cost
WSGN-AM	$60	12	$ 720	43	$2,580
WENN-FM	44	12	528	43	1,892
WKXX-FM / WERC-AM	85 (combo)	12 / 12	1,020	43 / 43	3,655
WZZK-FM	28	12	336	43	1,204
TOTAL	217	60	$2,604	215	$9,331

Sources: Ratings: *Arbitron*, April-May 1980 (based on Average Quarter Hour).
Costs: Direct inquiries to individual stations.

Television — 30-second local spots

Selection:

			TABLE I		TABLE II	
Daypart	Cost per Spot	Rating Adults 18-49	No. of Spots	Cost	No. of Spots	Cost
Early Fringe	$235	5.09	2	$ 470	17	$ 3,995
Late Fringe	175	10.39	2	350	17	2,975
Prime	550	12.90	3	1,650	18	9,900
TOTAL			7	$2,470	52	$16,870

Source: Ratings and Costs: *Media Market Guide*, 4th Qtr., 1980 (station averages).

Newspaper — ¼ page insertions

Selection:

Paper	Circulation	Audience Adults 18-49	Cost per Insert	TABLE I No. of Inserts	TABLE I Cost	TABLE II No. of Inserts	TABLE II Cost
POST HERALD	44,780	55,854	$ 672	2	$1,344	—	—
NEWS	144,183	179,839	901	—	—	—	—
Combo*			1,081	1(2)	1,081	8(16)	$8,648
TOTAL				4	$2,425	16	$8,648

Sources: Circulation: *Circulation,* 1980-181.
Audience, Adults 18-49: *Arbitron,* April-May 1980.
Costs: *Media Market Guide,* 4th Qtr., 1980 (open line rate for ¼ page ads).

*"Combo" represents a special rate for an insertion in both newspapers. Thus, 1 combo buy represents 2 insertions, and 8 combo buys represent 16 insertions.

WACO

Outdoor — 12' x 25' poster panels

Selection: 1 #25 GRP showing, consisting of 4 boards.
Sources: Reach/frequency: AMMO.
Costs: Allen Outdoor Advertising, 1981 rates.

Radio — 30-second spots

Selection: Top 5 stations for Adults 18-49 in Drive Time.

Station	Cost per Spot	TABLE I No. of Spots	TABLE I Cost	TABLE II No. of Spots	TABLE II Cost
WACO-AM	$ 6	12	$ 72	54	$ 324
KNFO-FM	12	12	144	54	648
KRZI-AM	8	12	96	54	432
WBAP-AM	10	12	120	54	540
KHOO-FM	15	12	180	54	810
TOTAL		60	$612	270	$2,754

Sources: Ratings: *Arbitron,* April-May 1980 (based on Average Quarter Hour).
Costs: Direct inquiries to individual stations.

Television — 30-second local spots

Selection:

Daypart	Cost per Spot	Rating Adults 18-49	TABLE I No. of Spots	TABLE I Cost	TABLE II No. of Spots	TABLE II Cost
Early Fringe	$135	4.8	0	0	0	0
Late Fringe	108	6.7	2	$216	34	$ 3,672
Prime	210	13.7	2	420	32	6,720
TOTAL			4	$636	66	$10,392

Source: Ratings and Costs: *Media Market Guide,* 4th Qtr., 1980 (station averages).

Newspaper — ¼ page insertions

Selection:

Paper	Circulation	Audience Adults 18-49	Cost per Insert	TABLE I No. of Inserts	TABLE I Cost	TABLE II No. of Inserts	TABLE II Cost
TRIBUNE HERALD (Morning)	24,401	29,281	$454	1	$454	11	$4,767
TRIBUNE HERALD (Evening)	13,270	15,924		1		10	
TEMPLE TELEGRAPH	398	478	232	1	232	0	—
TOTAL				3	$686	21	$4,767

Sources: Circulation: *Circulation,* 1980-1981.
Audience, Adults 18-49: *Arbitron,* April-May 1980.
Costs: *Media Market Guide,* 4th Qtr., 1980 (open line rate for ¼ page ads).

CHICAGO

Outdoor — 12′ x 25′ poster panels

Selection: 1 #25 GRP showing, consisting of 82 boards.

Sources: Reach/frequency: AMMO
Costs: Foster & Kleiser, 1981 rates.

Radio — 30-second spots

Selection: Top 5 stations for Adults 18-49 in Drive Time.

		TABLE I		TABLE II	
Station	Cost per Spot	No. of Spots	Cost	No. of Spots	Cost
WGN-AM	$222	28	$ 6,216	84	$18,648
WLS-AM	232	28	6,496	84	19,488
WLUP-FM	130	28	3,640	84	10,920
WMAQ-AM	140	28	3,920	84	11,760
WFYR-FM	126	28	3,528	84	10,584
TOTAL		140	$23,800	420	$71,400

Sources: Ratings: *Arbitron,* April-May 1980 (based on Average Quarter Hour).
Costs: Direct inquiries to individual stations.

Television — 30-second local spots

Selection:

			TABLE I		TABLE II	
Daypart	Cost per Spot	Rating Adults 18-49	No. of Spots	Cost	No. of Spots	Cost
Early Fringe	$ 715	3.36	5	$ 3,575	29	$ 20,735
Late Fringe	1,792	5.13	4	7,168	29	51,968
Prime	4,160	12.01	3	12,480	29	120,640
TOTAL			12	$23,223	87	$193,343

Source: Ratings and Costs: *Media Market Guide,* 4th Qtr., 1980 (station averages).

Newspaper — ¼ page insertions

Paper	Circulation	Audience Adults 18-49	Cost per Insert	TABLE I No. of Inserts	TABLE I Cost	TABLE II No. of Inserts	TABLE II Cost
SUN TIMES	646,565	941,915	$1,740	3	$ 5,220	11	$19,140
TRIBUNE	660,952	962,875	4,575	4	18,300	11	50,325
TOTAL				7	$23,520	22	$69,465

Sources: Circulation: *Circulation,* 1980-1981.
Audience, Adults 18-49: *Arbitron,* April-May 1980.
Costs: *Media Market Guide,* 4th Qtr., 1980 (open line rate for ¼ page ads).

MINNEAPOLIS

Outdoor — 12′ x 25′ poster panels

Selection: 1 #25 GRP showing, consisting of 45 boards.

Sources: Reach/frequency: AMMO
Costs: Naegele Outdoor, 1981 rates.

Radio — 30-second spots

Selection: Top 5 stations for Adults 18-49 in Drive Time.

Station	Cost per Spot	TABLE I No. of Spots	TABLE I Cost	TABLE II No. of Spots	TABLE II Cost
WCCO-AM	$160	23	$ 3,680	64	$10,240
KSTP-FM	103	24	2,472	64	6,592
WDGY-AM	92	24	2,208	64	5,888
KQRS-AM	92	24	2,208	64	5,888
KQRS-FM		24		64	
TOTAL		119	$10,568	320	$28,608

Sources: Ratings: *Arbitron,* April-May 1980.
Costs: Direct inquiries to individual stations.

Television — 30-second local spots

Selection:

Daypart	Cost per Spot	Rating Adults 18-49	TABLE I No. of Spots	TABLE I Cost	TABLE II No. of Spots	TABLE II Cost
Early Fringe	$ 385	3.2	1	$ 385	11	$ 4,235
Late Fringe	685	5.5	4	2,740	40	27,400
Prime	1,500	7.4	5	7,500	55	82,500
TOTAL			10	$10,625	106	$114,135

Source: Ratings and Costs: *Media Market Guide,* 4th Qtr., 1980 (station averages).

Newspaper — ¼ page insertions

Selection:

Paper	Circulation	Audience Adults 18-49	Cost per Combo Insert	TABLE I No. of Inserts	TABLE I Cost	TABLE II No. of Inserts	TABLE II Cost
TRIBUNE	142,506	204,242	$2,253	3	$ 6,759	9	$20,277
STAR	202,927	290,839		3		9	
PIONEER PRESS	71,676	102,727	1,314	3	3,942	9	11,826
DISPATCH	116,498	166,967		3		9	
TOTAL				12	$10,701	36	$32,103

Sources: Circulation: *Circulation,* 1980-1981.
Audience, Adults 18-49: *Arbitron,* April-May 1980.
Costs: *Media Market Guide,* 4th Qtr., 1980 (open line rate for ¼ page ads).

ROCHESTER

Outdoor — 12′ x 25′ poster panels

Selection: 1 #25 GRP showing, consisting of 15 boards.

Sources: Reach/frequency: AMMO
Costs: Rochester Outdoor Advertising Co. (1981 rates).

Radio — 30-second spots

Selection: Top 5 stations for Adults 18-49 in Drive Time.

		TABLE I		TABLE II	
Station	Cost per Spot	No. of Spots	Cost	No. of Spots	Cost
WHAM-AM	$ 55	12	$ 660	60	$ 3,300
WBBF-AM	35	13	455	60	2,100
WVOR-FM	48	13	624	60	2,880
WMJQ-FM	35	13	455	60	2,100
WHFM-FM	55	12	660	60	3,300
TOTAL		63	$2,854	300	$13,680

Sources: Ratings: *Arbitron,* April-May 1980 (based on Average Quarter Hour).
Costs: Direct inquiries to individual stations.

Television — 30-second local spots

Selection:

			TABLE I		TABLE II	
Daypart	Cost per Spot	Rating Adults 18-49	No. of Spots	Cost	No. of Spots	Cost
Early Fringe	$168	4.5	4	$ 672	46	$ 7,728
Late Fringe	168	2.9	0	—	—	—
Prime	560	11.5	4	2,240	42	23,520
TOTAL			8	$2,912	88	$31,248

Source: Ratings and Costs: *Media Market Guide,* 4th Qtr., 1980 (station averages).

Newspaper — ¼ page insertions

Selection:

Paper	Circulation	Audience Adults 18-49	Cost per Insert	TABLE I No. of Inserts	TABLE I Cost	TABLE II No. of Inserts	TABLE II Cost
DEMOCRAT & CHRONICLE	119,112	151,272	$1,418	—	—	1	$ 1,418
(daily)	122,067	155,025	1,418	1	$1,418	0	—
TIMES-UNION Combination	—	—	2,025	—	—	6(12)	12,150
DEMOCRAT & CHRONICLE (Sunday)	218,120	277,012	1,586	1	1,586	4	6,344
				2	$3,004	17	$19,912

Sources: Circulation: *Circulation*, 1980-1981.
Audience, Adults 18-49: *Arbitron*, April-May 1980.
Costs: *Media Market Guide*, 4th Qtr., 1980 (open line rate for ¼ page ads).

APPENDIX B

Membership Of The Outdoor Advertising Association Of America, Inc.

ABC Outdoor Advertising, Inc.
Pewaukee, WI

Ackerley Communications, Inc.
Seattle, WA

Acme Poster Advertising Co.
Natchitoches, LA

Action Outdoor Advertising
Bryan, TX

Adams Outdoor Advertising, Inc.
Yadkinville, NC

Alabama Outdoor Advertising Co.
Birmingham, AL

Allegheny Poster Advertising Co.
Terra Alta, WV

Allen Outdoor Advertising
Waco, TX

Allison Outdoor Advertising
Sylva, NC

Americus Poster Advertising Co.
Waynesboro, GA

Appalachian Poster Adv. Co., Inc.
Lenior, NC

Austin Poster Advertising Co.
Effingham, IL

B & B Outdoor Advertising
Shreveport, LA

Barrett Outdoor Communications
Milford, CT

Bay Poster Advertising Co.
Ashland, WI

Big Tex Outdoor Advertising, Inc.,
Brownwood, TX

Blocher Outdoor Adv. Co., Inc.
St. Cloud, MN

Bocook Outdoor Media, Inc.
Anderson, SC

Burkhart Advertising, Inc.
South Bend, IN

Buts Outdoor
Fond Du Lac, WI

C & U Poster Advertising Co.
Champaign, IL

Maurice Callahan & Sons
Pittsfield, MA

Cannon Advertising Co.
Murfreesboro, TN

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Carlson Outdoor Advertising
Rock Island, IL

Carolina Displays, Inc.
Raleigh, NC

Central Advertising Co.
Lansing, MI

Central Georgia Advertising Co.
Waynesboro, GA

Charleston Advertising Co., Inc.
Charleston, SC

Colony Advertising, Inc.
Richmond, VA

Columbia Outdoor Advertising, Inc.
Columbia, SC

The Columbus Outdoor Adv. Co.
Columbus, OH

Crawford Advertising of Mississippi, Inc.
Gulfport, MS

Creative Displays, Inc.
Tuscaloosa, AL

Creel Outdoor Advertising
Florence, SC

Cunningham Advertising, Inc.
St. Bonifacius, MN

W.L. Denny Outdoor Advertising
Columbus, OH

Derby Outdoor Advertising
Rapid City, SD

The Derse Company
Milwaukee, WI

Dingeman Advertising, Inc.
Traverse City, MI

Display, Inc.
Waterloo, IA

Display Media
Baraboo, WI

John Donnelly & Sons
South Portland, ME

Donrey Outdoor Advertising Co.
Fort Smith, AK

Dowie Outdoor, Inc.
Cedar Rapids, IA

Duplex Advertising Co.
Austin, TX

Estus Outdoor Advertising Co.
Savannah, GA

Fabian Advertising, Inc.
Herman, MN

Fendig Outdoor Advertising Co.
St. Simons Island, GA

Flynn Outdoor Advertising
Sioux City, IA

Flynn Outdoor Advertising
Sioux Falls, SD

Flynn Outdoor Advertising
Sheboygan, WI

Foster and Kleiser
Los Angeles, CA

Finney Outdoor Advertising Corp.
Fall River, MA

French Advertising
Fond Du Lac, WI

Gannett Outdoor Advertising Group
Phoenix, AZ

Georgia Outdoor Advertising, Inc.
Athens, GA

Ghaster Outdoor Advertising, Inc.
Lima, OH

Giddings Outdoor Advertising Service
Carrollton, KY

Green Bay Poster Advertising
Green Bay, WI

Griese Companies, Inc.
New Canaan, CT

H & V Advertising Co.
Rusk, TX

Hale Poster Advertising Co.
Iron Mountain, MI

Hansen Advertising Company, Inc.
Madison, WI

Frank Hardie Advertising, Inc.
Dubuque, IA

Harris Poster Advertising Co.
Griffin, GA

The Hathaway Advertising Co.
New Bedford, MA

Hausen Poster Advertising Co.
Fort Atkinson, WI

Hemmert Outdoor Advertising Co.
Sidney, OH

Heywood Company Outdoor Adv. of California
San Bernadino, CA

Holland Advertising Co.
Beaumont, TX

Hoosier Outdoor Advertising Corp.
Bloomington, IN

Illinois Poster Advertising Co.
Sterling, IL

Imperial Outdoor Advertising, Inc.
Lincoln, NE

Jackson Outdoor Advertising, Inc.
Michigan City, IN

Jackson Poster Advertising System
Charlottesville, VA

Johnstown Poster Advertising Co.
Johnstown, PA

Kanawha Valley Advertising Co.
Charleston, WV

Keleher Outdoor Advertising
Bartlesville, OK

Kenosha Advertising Co.
Kenosha, WI

Key Outdoor, Inc.
Kankakee, IL

Krain Outdoor Advertising
Cheltenham, PA

The Lamar Corporation
Baton Rouge, LA

Lamar Outdoor Advertising, Inc.
Jackson, MS

Jules Lauve, Jr., Inc.
Galveston, TX

Louisiana Sign Company, Inc.
Sulphur, LA

M & C Company
Eagle Grove, IA

McWhorter Advertising Corp.
Bridgeport, WV

Major Media, Inc.
Eden Prairie, MN

Marden Advertising Co.
Duncan, OK

Martin Communications, Inc.
Los Angeles, CA

Mathey-Strong, Inc. Outdoor Advertising
Peoria, IL

The R.C. Maxwell Company
Trenton, NJ

Miller Outdoor Advertising, Inc.
Laurens, SC

Missouri Valley Poster Advertising Co.
Falls City, NE

Modjeska Sign Studios, Inc.
Kingston, NY

Morgan Signs, Inc.
State College, PA

Moynihan Outdoor Advertising, Inc.
Princeton, IL

Murphy Advertising Co.
Waterbury, CT

Murphy Incorporated
Bridgeport, CT

Myhre Advertising
Great Falls, MT

Naegele Outdoor Advertising Co. of the Twin Cities, Inc.
Minneapolis, MN

National Advertising Company
Argo, IL

Nauman Outdoor Advertising Co.
Lancaster, OH

Newman Outdoor Advertising
Jamestown, ND

Northern Illinois Outdoor Advertising Co.
Freeport, IL

Norton Outdoor Advertising, Inc.
Cincinnati, OH

Norwood Advertising Co.
Brady, TX

Ohio Outdoor Advertising Corp.
Fremont, OH

Orde Advertising Co.
Green Bay, WI

Outdoor Communications, Inc.
Corinth, MS

Outdoor Suburban
Corsicana, TX

Outdoor West, Inc.
Tri-Cities, TN

Owens Outdoor Advertising
Van Wert, OH

Ozark Poster Advertising Co.
Harrison, AK

PBM Advertising Co.
Vienna, WV

Park Outdoor Advertising
Ithaca, NY

Patrick Outdoor Media, Inc.
Dunmore (Scranton), PA

Penn York Advertising, Inc.
York, PA

Philadelphia Outdoor
Gladwyne, PA

Piedmont Outdoor Advertising Co.
Greensboro, NC

Pittsburgh Outdoor Advertising
Pittsburgh, PA

Pocono Outdoor Advertising Co.
Bangor, PA

Port Arthur Poster Advertising Co.
Port Arthur, TX

Porter Poster Service
Richmond, IN

Racine Advertising Co.
Kenosha, WI

Reading Outdoor Advertising Co.
Centralia, IL

Reagan Outdoor Advertising, Inc.
Salt Lake City, UT

Richards of Course, Inc.
Syracuse, NY

Robbinswood, Inc.
Rockford, IL

Rochester Outdoor Advertising
Rochester, NY

Rollins, Inc.
Atlanta, GA

Root Outdoor Advertising, Inc.
Toledo, OH

Sapp Outdoor Advertising Co.
Statesboro, GA

Schloss Outdoor Advertising Co.
Charlotte, NC

Schwab Advertising System, Inc.
Davenport, IA

Shaw Poster Advertising Co.
Grand Forks, ND

Silsbee Poster Advertising Co.
Port Arthur, TX

Skoglund Communications, Inc.
La Crosse, WI

Smith Advertising Co.
Petersburg, VA

Southern Ohio Outdoor Advertising Co., Inc.
Hillsboro, OH

Spomer Outdoor, Inc.
Joplin, MO

Springfield Advertising Co.
Springfield, MA

Springfield Outdoor Advertising Co.
Springfield, OH

Staff Outdoor Advertising
East Liverpool, OH

Stait Outdoor Advertising Company
Philadelphia, PA

Standard of Appleton, Inc.
Appleton, WI

Standish-Johnson Company
Providence, RI

State Outdoor Advertising, Inc.
Gary, IN

H.A. Steen Industries, Inc.
Philadelphia, PA

Stewart Poster Advertising
Clinton, IA

Jay B. Stott Outdoor Advertising
Chico, CA

Summey Sign & Outdoor Advertising Co.
Black Mountain, NC

Sunrise Outdoor Advertising, Inc.
Garden City, NY

Texas United Outdoor Advertising Co., Inc.
Fort Worth, TX

Turner Advertising Co.
Atlanta, GA

Van Wagner Advertising Corp.
Jamaica, NY

Victor Sign Corporation
Chicago, IL

Virginia Outdoor, Inc.
Lynchburg, VA

Vivid, Inc.
Janesville, WI

Vogel Outdoor Advertising
Rochester, MN

Wardlow Advertising Co.
Waynesboro, GA

Waycross Outdoor Advertising Co.
St. Simons Island, GA

Weatherby Advertising Company
Jefferson City, MO

Western Advertising System
Abilene, TX

Whiteco Metrocom
Merrillville, IN

Whitehead Outdoor
Silver Spring, MD

Whitmier & Ferris Company, Inc.
Buffalo, NY

Woodie Outdoor Advertising Co., Inc.
Bluefield, WV

Y-Knot Outdoor Advertising, Inc.
Chariton, IA